

# Exhibit H

**Lisa Barbounis v. The Middle East Forum, et al.**

Seth Carson <seth@dereksmithlaw.com>

Thu 10/22/2020 2:22 PM

To: David Walton <dwalton@cozen.com>; Benson, Leigh Ann <LBenson@cozen.com>; Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>; Cavalier, Jonathan <JCavalier@cozen.com>

I am sending yet another email which I believe is my sixth attempt to schedule the depositions of:

1. Mathew Bennett
2. Daniel Pipes
3. Greg Roman
4. Mark Fink
5. Steve Levey
6. Laurence Hollin

I provided you with dates but I will schedule the depositions on just about any dates that I need to in order to accommodate schedules. The only dates I would not be able to reschedule are hearings. Any day for the rest of October 2020 is open.

We have also held two telephone conversations where we discussed outstanding discovery and deposition dates. One of these calls we held specifically to schedule the above six depositions. I was assured that your clients through counsel would provide dates for the above six people to attend and testify. That was a week ago.

I have tried to reach you every day for the past week to schedule the above six depositions. Your clients are refusing to provide dates. Your clients are refusing to attend and testify.

I send this final email hoping that your client will reconsider their bad faith stance in refusing to testify at deposition.

Please confirm when we can schedule the above depositions.

I will wait for your response.

Thank you.

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